



INTEROFFICE CORRESPONDENCE

DATE: January 20, 1993

TO: Distribution

FROM: M. B. Arndt, Environmental Restoration Management, Bldg. 080, X8509

SUBJECT: EARLY WARNING OF PENDING IAG VIOLATION - MBA-002-93

During a meeting with CDH and EPA on January 7, 1993, EPA provided us an advance copy of a letter the agencies intended to send to DOE-RFO the above referenced letter. This letter raises the concerns of EPA and CDH that DOE has failed to undertake the OU-2 bedrock investigation as required by the IAG. Completion of this bedrock characterization is necessary as part of the OU-2 RI/FS, the draft of which is due March 12, 1993.

The OU-2 bedrock investigation was originally slated to begin in 1992 but was deferred because there was insufficient funding to initiate the work. In addition to the funding issue, there was also a good technical rationale for deferring the work. The schedule for the OU-2 alluvial work was such, that the bedrock work would be completed before the alluvial work. This made little technical sense because the scope and need for assessment of the bedrock is really dependent on the findings of the nature and extent of contamination in the alluvial system.

The following is a brief chronology on correspondence (attached) between DOE and EG&G on the OU-2 bedrock investigation issue.

February 28, 1992

J. M. Kersh letter R. M. Nelson (DOE) requesting that DOE pursue concurrence from EPA and CDH to defer OU-2 bedrock field program due to FY92 funding shortfall. The letter also addresses technical issues on why the work should be deferred.

March 24, 1992

J. K. Hartman (DOE) letter to J. M. Kersh in response to the above recommending that EG&G incorporate the DOE "streamline approach" of evaluating the existing bedrock data and using the OU-2 alluvial field program to acquire some additional bedrock-related data.

April 2, 1992

EPA letter to DOE expressing concern that any OU-2 RFI/RI reports that do not contain the results of all investigations described in the work plan (sic...bedrock and alluvial) will be regarded as incomplete and unacceptable.

April 3, 1992

J. M. Kersh letter to R. M. Nelson requesting that DOE notify EPA and CDH that the Ou-2 RFI/RI (Alluvial) report milestone of March 12, 1993 will not be met because of the large backlog of analytical samples and extensive laboratory turnaround times.

April 24, 1992

J. M. Kersh letter to R. M. Nelson in response to March 24, 1992 letter that states EG&G understanding that RFO intends to support EG&G recommendation to postpone the bedrock field program until the alluvial field program data analysis is complete. EG&G takes exception to piggy-backing bedrock work on alluvial field program for technical reason.

August 19, 1992

J. M. Kersh letter to T. A. Vaeth (DOE) requesting that DOE notify EPA and CDH that existing milestone (March 12, 1993) for the Ou-2 RFI/RI report (alluvial) will not be met because of longer than anticipated laboratory turnaround times and inclusion of additional soil scrapes to support the human health risk assessment. The letter also included a schedule and logic diagram showing the proposed milestone extension dates.

September 28, 1992

J. K. Hartman letter to R. L. Benedetti recognizing April 2, 1992 letter on non-funding of OU-2 bedrock investigation. Letter requests EG&G to attend "SAFER" workshop to use observational approach in mitigating the bedrock schedule slippage. DOE suggests that agencies might be amendable to interim RFI/RI report that includes only data for alluvial program and preliminary risk assessment.

October 14, 1992

DOE letter to EPA and CDH confirming that OU-2 bedrock RFI/RI activities not conducted in FY'92 due insufficient funding. Letter proposes a meeting to discuss a revised schedule and the use of "SAFER" in evaluating bedrock conditions.

Distribution
January 20, 1993
MBA-002-93
Page 3

October 30, 1992

R. L. Benedetti letter to R. M. Nelson providing written notification on FY93 milestone status. Letter includes the two OU-2 milestones that will be missed due to DOE's decision to postpone the bedrock program.

November 24, 1992

Internal memo from E. A. Dille to M. S. Buddy summarizes the issues surrounding the schedule slippages and delays for OU-2. Describes results of October 5 and November 6 meetings with EPA and CDH in which agencies were still concerned why bedrock program was not funded in FY92

December 4, 1992

J. K. Hartman letter to R. L. Benedetti takes issue with Oct. 30, 1992 letter on reason for delay of the OU-2 bedrock program. Letter also cites a November 9, 1992 meeting with EPA/CDH in which the utilization of existing information to prepare draft and final RFI/RI reports was accepted by the agencies. EPA/CDH approval was contingent upon drilling confirmation wells. The letter further requests EG&G to prepare a formal presentation to the agencies on the revised approach and schedules on December 16, 1992.

December 14, 1992

R. L. Benedetti letter to R. M. Nelson confirming formal presentation of the OU-2 bedrock plan to EPA and CDH.

MBA:lm

Attachments:
As Stated

Distribution

L. Morrisette, WASC

R. L. Benedetti, Rocky Flats
M. S. Buddy, Rocky Flats
S. D. Cook, Rocky Flats
E. A. Dille, Rocky Flats